



United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

May 13, 2025

**VIA ECF**

The Honorable Arun Subramanian  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *American Federation of Teachers, AFL-CIO, et al. v. Goldstein, et al.*,  
No. 25 Civ. 03072 (SDNY) (AS)

Dear Judge Subramanian:

This Office represents Gregory Goldstein, in his official capacity as the Acting Director of the Federal Mediation and Conciliation Service (“FMCS”), FMCS, the United States of America, the United States Office of Management and Budget (“OMB”), and Russell T. Vought, in his official capacity as the Director of OMB (collectively, “Defendants” or the “Government”) in the above-referenced action brought by Plaintiffs pursuant to the Administrative Procedure Act (“APA”). ECF No. 46. We write respectfully to request a 12-day extension of the date by which to produce to Plaintiffs and file the administrative record, from May 15, 2025, to May 27, 2025.

On May 2, 2025, the Court directed the Government to compile and produce the administrative record to Plaintiffs by May 15, 2025. ECF No. 42. Since that time, the Government has been working diligently to compile the administrative record. The Government is in the process of determining the set of records that need to be included in the record. Because this case relates to FMCS’ implementation of Executive Order 14,234, which directed FMCS to reduce its personnel “to the minimum presence and function required by law,” Exec. Order No. 14238, 90 FR 13043 (Mar. 14, 2025), the administrative record may also contain documents with personally identifiable information requiring redaction. The Government respectfully submits that this brief extension would not unduly delay the litigation of the merits of this dispute.

This is the Government’s first request for an extension of time to produce and file the administrative record. Plaintiffs consent to this request.

We thank the Court for its consideration of this request.

Respectfully submitted,

JAY CLAYTON  
United States Attorney for the  
Southern District of New York

By: /s/ Lawrence H. Fogelman

LAWRENCE H. FOGELMAN  
REBECCA L. SALK  
Assistant United States Attorneys  
86 Chambers Street, Third Floor  
New York, New York 10007  
Tel.: (212) 637-2800

SO ORDERED. The Clerk of Court is respectfully directed  
to terminate the motion at ECF No. 54.



Arun Subramanian, U.S.D.J.  
Date: May 14, 2025